

28 SECOND STREET
TROY, NY 12180
PHONE: (518) 274-5820

200 HARBORSIDE DRIVE, SUITE 300
SCHENECTADY, NY 12305 PHONE:
(518) 783-3843

511 BROADWAY
SARATOGA SPRINGS, NY 12866
PHONE: (518) 584-8886

41 STATE STREET, SUITE 604-05
ALBANY, NY 12207
PHONE: (518) 486-8800

FAX: (518) 274-5875

www.joneshacker.com

November 30, 2022

Via ECF

Honorable Daniel J. Stewart, Magistrate Judge
United States District Court - Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway
Albany, New York 12207

RE: John Doe v. Rensselaer Polytechnic Institute
Case No. 20-cv-1185 (DNH/DJS)
Our File No. 2445.001

Dear Judge Stewart:

Our firm represents plaintiff John Doe in the above-referenced matter, and I write with the consent of defendant's attorney to request a 60-day extension for all discovery.

As initially indicated in defendant's request for an extension (Dkt. No. 46), I have recently returned from maternity leave and defendant's client continues to care for her gravely ill husband, which required further postponement of her deposition. Defense counsel and I have conferred and anticipate that we will be able to schedule the deposition of defendant's client in January of 2023.

For the reasons outlined above, we jointly respectfully request a 60-day extension for all discovery.

Thank you for your courtesies.

Respectfully,

E. STEWART JONES HACKER MURPHY, LLP

/s/Julie A. Nociolo
Julie A. Nociolo
E-Mail: jnociolo@joneshacker.com

JAN/lag

Cc: Rhiannon I. Spencer, Esq.